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## ANSWER

2025 MAR 12 PM 3:09

CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

CR25-01433 TUC-RM(BGM)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

United States of America

INDICTMENT

Plaintiff,

VS.

Rogelio Rodriguez Amaral,

Defendant.

### Violations:

18 U.S.C. § 554(a)  
(Attempted Smuggling of Goods from the  
United States)  
(Count One)

18 U.S.C. § 924(k)(2)(B)  
(Attempted Smuggling Goods from the  
United States with Intent to Commit  
Felony)  
(Count Two)

18 U.S.C. § 933(a)(2) and (b)  
(Felony Receipt of a Firearm)  
Count Three

18 U.S.C. § 924(d); 28 U.S.C. § 2461(c);  
50 U.S.C. § 4819(d)(1)(C)  
Forfeiture Allegation

## THE GRAND JURY CHARGES:

**COUNT ONE**

On or about December 3, 2024, in the District of Arizona, ROGELIO RODRIGUEZ AMARAL did knowingly and fraudulently attempt to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: fifty-seven (57) firearms, assorted ammunition of various calibers, and assorted firearm

1 magazines of various calibers; knowing the same to be intended for exportation contrary  
2 to any law or regulation of the United States, to wit: Title 50, United States Code, Section  
3 4819; Title 15, Code of Federal Regulations, Part 774; and Title 15, Code of Federal  
4 Regulations, Part 738; in violation of Title 18, United States Code, Section 554(a).

5 **COUNT TWO**

6 On or about December 3, 2024, in the District of Arizona, ROGELIO RODRIGUEZ  
7 AMARAL did knowingly attempt to smuggle or take out of the United States firearms and  
8 ammunition, that is, fifty-seven (57) firearms, and assorted ammunition of various calibers,  
9 with intent to engage in or to promote conduct that constitutes a felony, to wit: Title 18,  
10 United States Code, Sections 554(a), Smuggling of Goods from the United States.

11 All in violation of Title 18, United States Code, Section 924(k)(2)(B).

12 **COUNT THREE**

13 On or about December 3, 2024, in the District of Arizona, ROGELIO RODRIGUEZ  
14 AMARAL did receive from another person, in or otherwise affecting interstate or foreign  
15 commerce, fifty-seven (57) firearms, knowing or having reasonable cause to believe that  
16 such receipt would constitute a felony, in violation of Title 18, United States Code, Section  
17 933(a)(2) and (b).

18 **FORFEITURE ALLEGATION**

19 Upon conviction of Counts One through Three of the Indictment, the defendant,  
20 ROGELIO RODRIGUEZ AMARAL, shall forfeit to the United States any firearms and  
21 ammunition involved in the commission of the offense, pursuant to Title 18, United States  
22 Code, Section 924(d), and Title 28, United States Code, Section 2461(c), and any property  
23 constituting an item that is exported or intended to be exported, pursuant to Title 50, United  
24 States Code, Section 4819(d)(1)(C), including, but not limited to fifty-seven (57) firearms,  
25 assorted ammunition of various calibers, and assorted firearm magazines of various  
26 calibers.

27 If any of the property described above, as a result of any act or omission of the  
28 defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred

1 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of  
2 the court; d) has been substantially diminished in value; or e) has been commingled with  
3 other property which cannot be divided without difficulty, it is the intent of the United  
4 States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title  
5 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said  
6 defendant up to the value of the above forfeitable property, including, but not limited to,  
7 all property, both real and personal, owned by the defendant.

8 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States  
9 Code, Section 2461(c), Title 50, United States Code, Section 4819(d)(1)(C), and Rule  
10 32.2(a), Federal Rules of Criminal Procedure.

11 A TRUE BILL

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/S/

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FOREPERSON OF THE GRAND JURY

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Dated: March 12, 2025

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TIMOTHY COURCHAINE  
United States Attorney  
District of Arizona

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/S/

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ADAM D. ROSSI  
Assistant U.S. Attorney

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